

EXHIBIT B

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE JUUL LABS, INC., MARKETING,
SALES PRACTICES, AND PRODUCTS
LIABILITY LITIGATION

Case No. 19-md-02913-WHO

**PLAINTIFF'S PROPOSED VERDICT
FORM**

This Document Relates to:

*San Francisco Unified School District v.
JUUL Labs, Inc., et al.*

[PROPOSED] JURY VERDICT FORM

PUBLIC NUISANCE

1. Is youth e-cigarette use a public nuisance on SFUSD school grounds?

Yes___ No___

If you answered "Yes" to Question 1 (finding a public nuisance), answer Question 2. If you answered "No" to Question 1, skip Question 2 and proceed to Question 3.

2. Do you find Altria liable for Public Nuisance?

Yes___ No___

NEGLIGENCE

3. Do you find Altria liable for Negligence?

Yes___ No___

RICO

5. Do you find that Altria violated RICO?

Yes___ No___

6. Do you find that Altria conspired to violate RICO?

Yes___ No___

COMPENSATORY DAMAGES

6. In what amount, if any, was SFUSD damaged by Altria's negligence or RICO violations?

\$_____

PUNITIVE DAMAGES

If you answered "Yes" to Question 3 (finding Altria at fault for negligence), you must determine whether or not punitive damages are warranted.

7. Do you find by clear and convincing evidence that punitive damages are warranted against Altria:

Yes___ No___

8. What is the total amount of punitive damages that you find by a preponderance of the evidence should be assessed against Altria?

\$_____

Jury Foreperson